Duke, Daphne

From: Boyd, Jocelyn
Sent: Tuesday, September 25, 2018 12:04 PM
To: Easterling, Deborah; Duke, Daphne; Adams, Hope; Wheat, Jo; Melchers, Joseph; Butler, David
Subject: FW: additions to my voice last night

From: Sandra keeper [m[redacted]om]
Sent: Tuesday, September 25, 2018 10:45 AM
To: Boyd, Jocelyn <Jocelyn.Boyd@psc.sc.gov>
Subject: additions to my voice last night

Bifurcation and Rate increases September 24, 2018
2017-370-E, 2017-207-E, 2017-305-E

Public Service Commission
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Dear Commissioners,

I want to start out by clarifying a couple of things of which you may or may not be aware.
The way SCANA/SCE&G and, yes, Dominion, too, are trying to change the stigma that is now fully associated with the name of the New VC Summer Nuclear Reactor is appalling. And that you as a commission are not insisting on this new name to be dropped is sickening! This fiasco needs to be called by it's true name and NOT a new acronym to try to lift the disgrace. The fiasco NND is still a fiasco. The Boondoggle NND is still extortion to the ratepayers. The NND Debacle is still an ignominious failure! Any name you call this is still going to reflect the poor management and wasteful construction that went on until, and yes, is still going on in the closing of it. This is the VC Summer nuclear reactor debacle! Call it by it's name!
I quote the Hearing Officer's Directive of August 24, 2018: " Clearly, the benefits plans under the merger include proposals for

rate mitigation for, inter alia, abandonment costs incurred by SCE&G. Therefore, the concepts of abandonment and merger are related and clearly constitute requests made
pursuant to the Base Load Review Act." This sounds VERY much as if the hearing officer, at least, has made his mind up. The rate mitigation for the ratepayers needs to be dealt with and finished BEFORE Dominion's merger is considered!
The general citizen/ratepayer may not know what "rate mitigation for, inter alia abandonment costs" in this case means...it means "among other things"! This is just another one of those open-ended sentences SCANA/SCE&G has been so notorious for using. This is so open that almost any costs they choose to apply as "abandonment costs" could be included! And to tie this with Dominion is unbelievable! Dominion was not in this mess when these costs were incurred! Dominion simply wants to have an open-ended money source if they end up buying SCANA/SCE&G. But let's just see how poorly the Directive ties these things together... "Therefore, the concepts of abandonment and merger are related and clearly constitute requests made pursuant to the Base Load Review Act." This statement is NOT clear in any way possible! And it does not in fact tie them together. "Pursuant to the BLRA" is trying to tie these costs with the BLRA. How, if this is true, could that possibly tie in Dominion? Dominion did not start the construction. Dominion did not request rate increases. Dominion was no where to be seen when this debacle was shut down. But they are here right now wanting all this money to continue so they get the ratepayers money for nothing. The unjust rate increases, the inadequate proof of prudency, the out and out extortion is not any of Dominion's business. This needs to be settled and cleared BEFORE Dominion is even discussed. The benefits plan from Dominion has nothing at all to do with whether the rate increases imposed over the last ten years on the ratepayers by SCANA/SCE&G were prudent or not. The Dominion benefits plan has nothing whatsoever to do with why the abandonment of the VC Summer new nuclear reactors' costs were forced on the ratepayers. Dominion has nothing whatsoever to do with either of these issues and therefore should not have a

place at the table! Dominion said under oath to the legislature that the rates they would first impose will only be in place for two(2) years! How is that going to help the ratepayers?
I am aware a ruling has been made on this next subject, but it needs to be rescinded. The bifurcation of dockets 2017-207-E and 2017-305-E from 2017-370-E would, in fact, stop the "unwieldy", your word not mine, mess of having them placed together.
What can you possibly be thinking to say these are of the same thing. They are not. You need to rescind your ruling on that matter. The rate increases and their prudency were matters dealing with years of fabrication, falsification, half-truths, exaggeration, omission, and invention on the part of SCANA/SCE&G. And not any of this has or had anything to do with Dominion and their purchase of SCANA. Therefore, these rate increases and the prudency of their submissions should be weighed and decided with Dominion no where in the equation. SCANA/SCE&G is notorious for swamping their dissenters under papers. "Unwieldy"? When I was an intervenor against SCANA/SCE&G, I was outraged at how many whole paragraphs and phrases were obviously copied and pasted throughout the documentation to make more reading for their opposition. The term you use is "unwieldy".. SCANA/SCE&G have been woefully guilty of making their cases concerning the rate increases "unwieldy" from the beginning!
It is my understanding that, regarding the cases at hand, there are millions of pages of documents SCANA/SCE&G are presenting in their attempt to swamp their opposition. "Unwieldy"? But, I am also told that in all of the garbage they are sending to the lawyers, and you, there are jewels of information in between all the copied claptrap.
Dominion has never had anything to do with the rate increases and their prudency, or the BASE LOAD REVIEW ACT. For the Directive to use the the terms "that witnesses would be inconvenienced" is really hard to swallow. Dominion's witnesses have nothing to do with the rates increases or their prudency, the BLRA or anything dealing with the matters in the two SCANA

dockets. And Dominion has shown by their advertisements and "donations" that money to bring their witnesses in when their docket comes up would not be much of an "inconvenience"! SCANA simply placing the Dominion name on those dockets does NOT entitle Dominion a place at the table.

As far as the rate increases are concerned, for the so-called interest on the VC Summer new nuclear reactor debacle, the ratepayers were totally taken advantage of. The Public Service Commission allowed these rates to be increased with no regard or proof as to exactly what they were to pay for. The documentation presented by SCANA was never exact. Slides and intentionally confusing graphs were always presented as if they were directing facts. There was no tangible proof that the money for "this exact rate increase" would be placed on "this exact interest rate for this exact loan or investment". I would like to see every loan and its percentage rate, and every place where the ratepayers' money was used. Where is that proof? Any good accountant knows you need to have those proofs. Every good accountant knows you need to have checks and balances. But in this case there are NONE! And in this case, you, the Commissioners, did not demand any. You simply accepted the charts and slides SCANA mesmerized you with as some sort of proof.

You, the Commissioners, have the power to demand that proof. You have the power to demand that every penny taken from the ratepayers was and is being used properly, for what it was and is being taken.

You have the power to totally stop this extortion of the ratepayers money right now! And you should! The phrase SCANA so laughingly used before a judge recently, "the private property" (the ratepayers' money) "being taken without compensation" is sickening! Well, That is a great definition of extortion and that is what has been happening to the ratepayers with every single rate increase designated for the VC Summer nuclear reactor build from even before this fiasco broke ground.

The BLRA is a law that was constructed by SCANA. They had it passed with their "donations". And it passed into law in a ridiculous 21 days! The majority of House and the Senate have,

at this late date, seen the error in their choice to allow this catastrophe to happen. They have, to their credit, come to their senses about how wrong the BLRA was, and is, and are working as they might to stop it and change the situation that that one law has wreaked on the ratepayers and the entire state.
The Hearing Officer's Directive of August 24, 2018 is making a mockery of justice for the ratepayers. The directive forgoes the rights of the ratepayers to get their money for the extortion being perpetrated against them by the rate increases for this failed project.
Dominion was not present when these rate increases were requested as prudent. Dominion was not present when these improper rate increases were granted by this Commission. And Dominion has nothing whatsoever to do with the abandonment of VC Summer new nuclear reactors, and until those matters are totally taken care of, Dominion should be out of the discussion. Simply giving what appears to be a "fast and easy way out" by Dominion is not legal standing to be in these discussions or decisions . After the matters of rate mitigation and abandonment AND prudency are resolved, then and only then, should the Dominion dockets with SCANA/SCE&G be held in hearings.
The ratepayers deserve a rightful decision in the matters with SCANA/SCE&G before any ownership has changed hands in order to keep the legalities clear! Your proposal to NOT bifurcate these dockets is totally against the rights of the ratepayers. SCANA/SCE&G need to settle with the ratepayers rights before they move on to selling out.
I believe you understand this and it is not clear how or why your judgment in this matter is so flawed. It appears to the public that SCANA/SCE&G and Dominion have a stronger hand with your decision making than the ratepayers have.
Again quoting here "Accordingly, decisions on both issues must be made by December 21, 2018, and no delay is appropriate for the merger decision." I am not clear where you are locating a deadline for the merger decision between SCANA/SCE&G and Dominion. The only deadline I am aware of is for you to make a decision on the rate adjustments due the ratepayers.

"The schedule clearly limits the time frame in which the Commission has to decide these and other issues to the point where a bifurcation or sequencing and all the steps that go with these would not be possible to accomplish in an efficient manner. The time frame for the merits hearing set by the General Assembly would not provide sufficient time to hold what essentially would be two proceedings, whether the hearing was bifurcated or sequenced."

I am not clear where you are locating a deadline for the merger between SCANA/SCE&G and Dominion (2017-370-E). The only deadline that I am aware of is the one to resolve the issue of prudency and rate increases on the ratepayers (2017-207-E and 2017-305-E).

Quoting again.. "Further, the procedure proposed by CCL and SACE would be unwieldy," where is the legal standing for keeping things unwieldy? Does SCANA/SCE&G openly admit they have produced MILLIONS of documents to the other side and still not produce the documents requested? Isn't that intended to make the process "unwieldy" for the CCL, SACE, Friends of the Earth, and Sierra Club? Aren't they "causing confusion and disruption in the hearing process. Discerning what testimony should be presented in what proceeding, or what part of a proceeding would be very difficult, to the point where much of the hearing time could conceivably be occupied with procedural objections." The only procedural objections would be brought up by Dominion and if they are not in those dockets, they would have no legal grounds for objections!

You must at all times remember that when SCANASCE&G uses the term "customers" they are referring to the shareholders and NOT The ratepayers. I will always refer to the ratepayers in these issues. Our money is what is being stolen from us by means of the EXTORTION of the Base Load Review Act written by SCANA/SCE&G.

Sandra Wright